

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
Malsbury, Armenante & Kaplan, P.A.
12 N. Main Street, P. O. Box 157
Allentown, New Jersey 08501
(609) 259-7944
Attorneys for Debtor

In Re:

Bear Swamp Road Associates, LLC,

Debtor-in-Possession

Case No.: 08-14304

Adv. No.:

Hearing Date:

Judge: Michael B. Kaplan

APPLICATION FOR ORDER SHORTENING
TIME PERIOD FOR NOTICE UNDER FED. R. BANKR. P. 9006(c) (1)

The application of Scott Eric Kaplan, Esquire, respectfully represents:

1. I am the attorney for the Debtor in this matter.

2. On October 30, 2009, Robert L. Saldutti, Esquire, on behalf of States Resources Corporation, and John G. Takacs, Esquire, receiver for Mr. Saldutti, executed and levied upon the DIP account of the Debtor in willful violation of the automatic stay and contrary to 11 U.S.C. §362 (a). These willful actions are illegal, detrimental to Debtor's estate and must be immediately halted. Further, these attorneys' attempt to circumvent actions in bankruptcy Court subject them to liability for any/or all damages incurred as well as punitive damages in accordance with 11 U.S.C. §362(k).

3. Reduction of the time period in question is not prohibited under Fed. R. Bank. P. 9006 (c) (2) and the rules listed therein.

WHEREFORE, applicant requests entry of the order submitted herewith.

Date: November 12, 2009

/s/ Scott Eric Kaplan

Scott Eric Kaplan,

Applicant